



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street  
San Francisco, CA 94105-3901**

February 22, 2016

Ms. Sarah Ross Arrouzet  
U.S. Army Corps of Engineers  
Sacramento District  
1325 J Street  
Sacramento, CA 95814-2922

Subject: West Sacramento Project Final Environmental Impact Statement / Environmental Impact Report, Yolo County, California [CEQ# 20160015]

Dear Ms. Ross Arrouzet:

The Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the above project. Our review and comments are pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

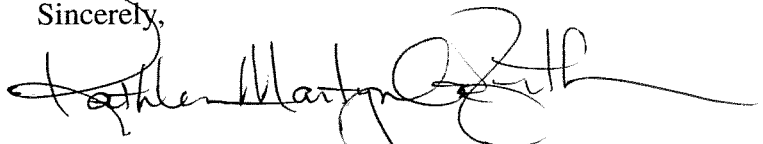
EPA recognizes the value and importance of improving the flood-resiliency of the Bay Delta region and appreciates the Corps' efforts to do so in the least environmentally damaging ways practicable. In our September 2014 comments on the DEIS for this project, EPA raised questions and concerns about the proposed project's potential impacts to wetlands and waters of the U.S., noting that additional information was needed to better understand the potential effects upon these resource areas. We also raised concerns related to impacts to riparian habitats, air quality, climate change, consultation with tribal governments, and reuse of dredged materials. Upon review of the FEIS, we find that the FEIS provides additional clarification in response to many of EPA's comments; however, some of the responses and/or EIS revisions, particularly those pertaining to wetlands and waters of the U.S., do not fully address our stated concerns.

EPA has continuing concerns regarding the Corps' continued deferral of detailed wetlands-related analyses to the post-NEPA project development period. Specifically, the formal wetland delineation, wetland avoidance and minimization strategies, and the specific location and nature of compensatory mitigation are all discussed only in a general manner in the FEIS. While EPA understands the need for some of this information to remain programmatic at this point in the project development process, we continue to believe that additional details regarding these analyses, particularly those related to mitigation, are important to a comprehensive understanding of the project and its potential effects, and should be publicly disclosed and considered as part of the NEPA decision making process. We also note that, despite the revisions made to the 404(b)(1) analysis (Appendix F), the analysis still does not clearly identify the Least Environmentally Damaging Practicable Alternative, yet the FEIS clearly states that Alternative 5 has been found to be the LEDPA. The basis for this finding, therefore, remains unclear.

EPA appreciates the Corps' intent to consider a wide range of possible avoidance, minimization, and mitigation measures for reducing the project's contribution to climate change. We encourage the Corps to implement the measures needed to maximize avoidance and mitigation.

Thank you for the opportunity to review the FEIS. We look forward to continuing to work with the Corps Sacramento District on this and similar levee improvement projects under development in the Bay Delta region. Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact Carter Jessop, the lead reviewer for this FEIS. Carter can be reached at (415) 942-3815 or [jessop.carter@epa.gov](mailto:jessop.carter@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Martyn Goforth', with a long horizontal flourish extending to the right.

Kathleen Martyn Goforth, Manager  
Environmental Review Section